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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION,) Case No.: 2:16-cv-01495-JAD-PAL
Plaintiff,)
vs.) **2ND JOINT STIPULATION AND ORDER FOR
TEMPORARY STAY OF PROCEEDINGS**
NEVADA HEALTH CENTERS, INC.,)
ULTRACARE LAS VEGAS and Does 1-5)
Inclusive,)
Defendants.)

1 The parties, by and through their undersigned respective counsel, hereby stipulate to and
2 request that the Court continue the discovery deadline in this matter for an additional sixty (60)
3 days as counsel for the parties have a mutual, good faith belief that productive settlement
4 negotiations over the last several weeks will result in final resolution of this matter by Friday,
5 July 7, 2017.

6 This Court previously granted a Joint Stipulation and Order for Temporary Stay of
7 Proceedings that gave the parties until May 5, 2017 to resolve this matter (Docket No. 33).
8 Plaintiff and Defendant Ultracare Las Vegas reached a resolution and on March 20, 2017, the
9 District Court signed the Consent Decree (Docket No. 39). Plaintiff and Defendant Nevada
10 Health Centers have made significant progress in their settlement discussions. The parties have
11 exchanged multiple consent decree drafts and engaged in meaningful telephonic settlement
12 discussions. However, there are a few additional issues the parties need to resolve. Additionally,
13 further communication by the previously agreed upon May 5, 2017 deadline may prove difficult
14 because the EEOC's Las Vegas Local Office is moving. This extension will also allow the
15 parties to finalize settlement without incurring the significant costs and fees associated with
16 discovery. Accordingly, Plaintiff and Defendant Nevada Health Centers request an additional
17 sixty (60) days to finalize settlement.

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1 Therefore, the parties respectfully request:

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- The Court continue the stay in this matter through July 7, 2017.
- The Court further order that the parties jointly submit a proposed consent decree on or before July 7, 2017. However, if settlement negotiations come to an impasse, the parties shall file a status report and an amended discovery plan at any time prior to, but no later than, July 17, 2017.

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8 IT IS SO STIPULATED.

9 Dated: April 27, 2017

10 Respectfully submitted,

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13 /s/ Nechole M. Garcia

14 NECHOLE M. GARCIA, ESQ.

15 ERIC YAU, ESQ.

16 ANNA Y. PARK, ESQ.

17 SUE J. NOH, ESQ.

18 RUMDOL VUONG, ESQ.

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Attorneys for Plaintiff
U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION

Respectfully submitted,

/s/ Wendy M. Krincek

WENDY M. KRINCEK, ESQ.

KATHRYN B. BLAKELY, ESQ.

LITTLER MENDELSON, P.C.

Attorneys for Defendant
NEVADA HEALTH CENTERS, INC.

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: April 28, 2017

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29 **UNITED STATES DISTRICT COURT**

30 **DISTRICT OF NEVADA**

31 U.S. EQUAL EMPLOYMENT) Case No.: 2:16-cv-01495-JAD-PAL
32 OPPORTUNITY COMMISSION,)
33)
34 Plaintiff,)
35)
36 vs.)
37)
38 NEVADA HEALTH CENTERS, INC.,)
39 ULTRACARE LAS VEGAS and Does 1-5)
40 Inclusive,)
41 Defendants.)

42 **CERTIFICATE OF SERVICE**

CERTIFICATE OF SERVICE

I am, and was at the time the herein mentioned delivery took place, a citizen of the United States, over the age of eighteen (18) years. I am employed in the Legal Unit of the Los Angeles District Office of the United States Equal Employment Opportunity Commission. My business address is Equal Employment Opportunity Commission, Las Vegas Local Office, 333 Las Vegas Blvd. South, 5th Floor, Suite 5560, Las Vegas, NV 89101.

On the date that this certificate was executed, as shown below, I served the foregoing
**2ND JOINT STIPULATION AND ORDER FOR TEMPORARY STAY OF
PROCEEDINGS**, via the Court's CMECF electronic filing system at:

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Attorneys for Defendant Nevada Health Centers

Donald J. Green
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Attorney for Defendant Ultracare Las Vegas

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 27, 2017.

/s/ Nechole Garcia
Nechole Garcia